

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: TBD

Obj. Deadline: Mar. 24, 2025 at 4:00 p.m. ET

FINAL FEE APPLICATION OF ERNST & YOUNG LLP

Name of Applicant	Ernst & Young LLP
Authorized to Provide Professional Services to:	the Debtors and Debtors-in-Possession
Date of Retention:	January 17, 2023 <i>nunc pro tunc</i> to November 28, 2022
Period for which compensation and reimbursement is sought:	November 28, 2022 through October 8, 2024
Amount of fees to be approved on a final basis as reasonable and necessary:	\$31,477,651.25
Amount of expenses to be approved on a final basis as actual, reasonable and necessary:	\$1,009,481.42
Total compensation paid to date:	\$19,913.367.13
Total expenses paid to date:	\$700,943.02

This is a(n) ___ monthly ___ interim X final application. No prior application has been filed with respect to this Fee Period.

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

PRIOR MONTHLY FEE STATEMENTS FILED

Dated Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fee ²	Approved Expenses ²
D.I. 847 filed on March 10, 2023	November 28, 2022, through December 31, 2023	\$1,264,113.80	\$12,330.63	\$2,086,386.45	\$43,916.74
D.I. 1500 filed on May 16, 2023	January 1, 2023, through January 31, 2023	\$1,130,705.00	\$32,893.58		
D.I. 1654 filed on June 15, 2023	(First Interim Fee Application) November 28, 2022, through January 31, 2023	\$2,394,291.00	\$45,224.21		
D.I. 1627 filed on June 13, 2023	February 1, 2023, through February 28, 2023	\$1,215,238.75	\$10,381.09	Pending	Pending
D.I. 1932 filed on July 27, 2023	March 1, 2023, through March 31, 2023	\$1,596,707.00	\$26,108.75	Pending	Pending
D.I. 2985 filed on October 3, 2023	April 1, 2023, through April 30, 2023	\$1,372,281.75	\$7,276.19	Pending	Pending
D.I. 17671 filed on June 14, 2024	(Second Interim Fee Application) February 1, 2023, through April 30, 2023	\$4,184,211.75	\$43,766.03	Pending	Pending
D.I. 3377 filed on October 25, 2023	May 1, 2023, through May 31, 2023	\$1,327,255.00	\$17,767.20	Pending	Pending
D.I. 5317 filed on January 3, 2024	June 1, 2023, through June 30, 2023	\$1,428,255.75	\$4,846.35	Pending	Pending
D.I. 12924 filed on April 26, 2024	July 1, 2023, through July 31, 2023	\$1,437,560.80	\$11,439.23	Pending	Pending

Dated Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fee ²	Approved Expenses ²
D.I. 29610 filed on February 20, 2025	(Third Interim Fee Application) May 1, 2023, through July 31, 2023	\$4,193,071.55	\$34,052.78	Pending	Pending
D.I. 12925 filed on April 26, 2024	August 1, 2023 through August 31, 2023	\$1,899,489.25	\$21,319.67	Pending	Pending
D.I. 12926 filed on April 26, 2024	September 1, 2023 through September 30, 2023	\$1,356,469.80	\$9,754.18	Pending	Pending
D.I. 15991 filed on May 28, 2024	October 1, 2023 through October 31, 2023	\$1,518,739.15	\$22,627.72	Pending	Pending
D.I. 29611 filed on February 20, 2025	(Fourth Interim Fee Application) August 1, 2023, through October 31, 2023	\$4,774,698.20	\$53,701.57	Pending	Pending
D.I. 15992 filed on May 28, 2024	November 1, 2023 through November 30, 2023	\$1,246,282.20	\$54,286.25	Pending	Pending
D.I. 15993 filed on May 28, 2024	December 1, 2023 through December 31, 2023	\$1,125,361.50	\$40,092.30	Pending	Pending
D.I. 16530 filed on June 3, 2024	January 1, 2024 through January 31, 2024	\$1,479,449.30	\$141,396.07	Pending	Pending
D.I. 29612 filed on February 20, 2025	(Fifth Interim Fee Application) November 1, 2023, through January 31, 2024	\$3,851,093.00	\$235,774.62	Pending	Pending
D.I. 16545 filed on June 3, 2024	February 1, 2024 through February 29, 2024	\$1,444,701.70	\$96,102.20	Pending	Pending

Dated Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fee ²	Approved Expenses ²
D.I. 16548 filed on June 3, 2024	March 1, 2024 through March 31, 2024	\$966,665.10	\$34,889.16	Pending	Pending
D.I. 24500 filed on September 10, 2024	April 1, 2024 through April 30, 2024	\$1,326,416.00	\$69,783.85	Pending	Pending
D.I. 29613 filed on February 20, 2025	(Sixth Interim Fee Application) February 1, 2024, through April 31, 2024	\$3,737,782.80	\$200,775.21	Pending	Pending
D.I. 27391 filed on October 30, 2024	May 1, 2024 through May 31, 2024	\$1,542,852.80	\$88,956.07	Pending	Pending
D.I. 29791 filed on February 28, 2025	June 1, 2024 through June 30, 2024	\$1,527,863.50	\$78,418.30	Pending	Pending
D.I. 29792 filed on February 28, 2025	July 1, 2024 through July 31, 2024	\$1,986,379.15	\$102,441.32	Pending	Pending
D.I. 29801 filed on February 28, 2025	(Seventh Interim Fee Application) May 1, 2024, through July 31, 2024	\$5,057,095.45	\$269,815.69	Pending	Pending
D.I. 29797 filed on February 28, 2025	August 1, 2024 through August 31, 2024	\$1,989,195.40	\$90,269.23	Pending	Pending
D.I. 29798 filed on February 28, 2025	September 1, 2024 through September 30, 2024	\$983,752.20	\$36,102.07	Pending	Pending
D.I. 29799 filed on February 28, 2025	October 1, 2024 through October 8, 2024	\$312,459.90	\$0.00	Pending	Pending

Dated Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fee ²	Approved Expenses ²
D.I. 29807 filed on February 28, 2025	(Eighth Interim Fee Application) August 1, 2024, through October 8, 2024	\$3,285,407.50	\$126,371.30	Pending	Pending

² Approved fees and expenses for the interim fee applications reflect agreed reductions by EY, the U.S. Trustee and Fee Examiner.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,²

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

FINAL FEE APPLICATION OF ERNST & YOUNG LLP

Ernst & Young LLP (“EY LLP”), Tax Services Provider to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors”), hereby submits this *Final Fee Application of Ernst & Young LLP* (the “Application”) for allowance of compensation for professional services rendered and expenses incurred for the period from November 28, 2022 through and including October 8, 2024 (the “Application Period”). In support the Application, EY LLP respectfully states as follows:

Background

1. On November 11 and November 14, 2022,³ the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) voluntary petitions for relief under title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (as amended or modified, the “Bankruptcy Code”). From November 11, 2022 through January 3, 2025, the Debtors operated their businesses and managed their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. Joint administration of the Debtors’ cases

² The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

³ November 11, 2022 is the petition date for all Debtors, except for Debtor West Realm Shires Inc.

(the “Chapter 11 Cases”) was authorized by the Court by entry of an order on November 22, 2022 [D.I. 128]. On December 15, 2022, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed an Official Committee of Unsecured Creditors (the “Committee”) pursuant to section 1102 of the Bankruptcy Code [D.I. 231].

2. On January 17, 2023, the Court entered *the Order Authorizing the Retention and Employment of EY LLP as Tax Services Provider Nunc Pro Tunc to November 28, 2022* [D.I. 505] authorizing the retention and employment of EY LLP as the Debtors’ Tax Services Provider, *nunc pro tunc* to November 28, 2022.

3. On January 9, 2023, the Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 435] (the “Interim Compensation Order”).

4. On March 8, 2023, the Court entered the *Order (I) Appointing Fee Examiner and (II) Establishing Procedures for Consideration of Requested Fee Compensation and Reimbursement of Expenses* [D.I. 834] appointing Katherine Stadler (the “Fee Examiner”) to serve as the fee examiner in these Chapter 11 Cases and establishing certain procedures in connection therewith.

5. On October 8, 2024, the Court entered the *Findings of Fact, Conclusions of Law and Order Confirming the Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404] (the “Confirmation Order”) confirming the *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* (the “Plan”).

6. On January 3, 2025, the Plan went effective. *See* [D.I. 29197].

Jurisdiction

7. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and

1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware dated as of February 29, 2012. This is a core proceeding within the meaning of 28 U.S.C. § 157(b). Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409. Pursuant to Rule 9013-1(f), the Debtors consent to the entry of a final order or judgment by the Court in connection with this Motion to the extent it is later determined that the Court absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Relief Requested

8. By this Final Application and in accordance with the Interim Compensation Order, EY LLP seeks approval and allowance on a final basis of compensation for professional services rendered and reimbursement of expenses incurred for the Application Period (the “Period Compensation”). EY LLP has filed and served monthly fee applications covering the Application Period (collectively, the “Monthly Fee Applications”).

9. In accordance with the United States Trustee’s *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, this Application is supported by the following exhibits:

- **Exhibit A:** Summary of Hours and Fees by Professional of EY LLP that worked on the Chapter 11 Cases
- **Exhibit B:** Summary of Hours and Fees by Matter Category
- **Exhibit C:** Summary of Expenses
- **Exhibit D:** Certification of Thomas M. Shea in support of the Application

Compensation Requested

10. EY LLP seeks final allowance of fees in the amount of \$31,477,651.25 for services rendered during the Application Period and \$1,009,481.42 of related expenses, which were incurred during the Application Period

11. The services performed by EY LLP during the Application Period included tax services.

Notice

12. Notice of this Application has been given to the following parties or, in lieu of, to their counsel, if known: (a) the U.S. Trustee; (b) the Official Committee of Unsecured Creditors (c) the Fee Examiner and (d) all parties required to be given notice in the Interim Compensation Order. EY LLP submits that no other or further notice is necessary.

Conclusion

WHEREFORE, EY LLP respectfully requests that the Bankruptcy Court (i) approve the Application and (ii) grant such further relief as is just and proper.

Dated: March 3, 2025
New York, NY

/s/ Thomas M. Shea
Thomas M. Shea
Partner/Principal
Ernst & Young LLP